

Ryan J. Cooper  
Renier Pierantoni  
**COOPER, LLC – COUNSELORS AT LAW**  
108 N. Union Ave., Suite 4  
Cranford, NJ 07016  
ryan@cooperllc.com  
renier@cooperllc.com  
908.514.8830 x101

Misha Isaak  
James Kilcup  
Alexandra Giza  
**STOEL RIVES LLP**  
760 SW Ninth Ave. Suite 3000  
Portland, OR 97205  
Telephone: (503) 224-3380  
Email: misha.isaak@stoel.com

*Attorneys for Defendant Labels & Lists, Inc.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, *as assignee of*  
*individuals who are Covered Persons*, et  
al.,

Plaintiffs,

v.

LABELS & LISTS, INC., et al.,

Defendants.

**CIVIL ACTION**

Docket No. 1:24-cv-4174-HB

**MOTION  
TO DISMISS**

**PLEASE TAKE NOTICE** that, on a date to be determined by the Court, and as soon as counsel may be heard, Defendant Labels & Lists, Inc. (“L2”), by and through its counsel Cooper, LLC and Stoel Rives, LLP, shall move before the United States District Court for the District of New Jersey, at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, for an order dismissing Plaintiffs’ Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, L2 shall rely on, and joins, the Memorandum of Law in Support of Defendants’ Consolidated Motion to Dismiss Pursuant to Rule 12(b)(6), and supporting documents, filed today in the related action *Atlas Data Privacy Corp., et al., v. DM Group, Inc.*, No. 1:24-cv-4075 (D.N.J.).

Dated: March 18, 2025

Respectfully submitted,  
COOPER, LLC

By: /s/Ryan J. Cooper

Ryan J. Cooper  
Renier P. Pierantoni  
ryan@cooperllc.com  
renier@cooperllc.com  
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misha.isaak@stoel.com  
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james.kilcup@stoel.com  
Alexandra Choi Giza  
alexandra.giza@stoel.com  
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**Certificate of Service**

I hereby certify that on this date I caused a true and complete copy of the foregoing Motion to Dismiss to be electronically filed with the United States District Court for the District of New Jersey, and to be served upon all parties by means of the ECF filing system.

I further certify that the foregoing statement made by me is true. I am aware that if the foregoing statement made by me is willfully false, I am subject to punishment.

Dated: March 18, 2025

/s/Ryan J. Cooper  
Ryan J. Cooper